

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Proposed Consent Order Page 1 of 2

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

53575

Morton & Craig LLC

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Attorney for Santander Consumer USA Inc. dba

Chrysler Capital

In Re:

ASSUNCAO BROS., INC.

Case No.: 22-16159

Chapter 11

Judge: Christine M. Gravelle

**CONSENT ORDER VACATING AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) is hereby **ORDERED**.

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Debtor: Assuncao Bros., Inc. / 53575

Case No: 22-16159 (CMG)

Consent Order Vacating Automatic Stay

Upon consideration of the application of **Santander Consumer USA Inc. dba Chrysler Capital** for an order for relief from the automatic stay, and good cause appearing therefore, it is hereby

**ORDERED** that the automatic stay of the Bankruptcy Code section 362(a) is vacated to permit Santander Consumer USA Inc. dba Chrysler Capital to pursue the its rights in the personal property described below to the extent and in the manner provided by any applicable contract documents and non-bankruptcy law.

**Ordered that the terms of this order shall take effect immediately.**

The applicant shall serve this order on the debtors and the trustee.

Description of Subject Personal Property

2019 Jeep Grand Cherokee

Vehicle identification number

1C4RJFCGXKC552817

We hereby consent to the form and entry of the within order:

/s/ Michael R. Herz

Michael R. Herz, Esq.

Attorney for the debtor, Assuncao Bros., Inc.

/s/ John R. Morton, Jr., Esq.

John R. Morton, Jr., Esq.,

Attorney for Creditor, Santander Consumer USA Inc. dba Chrysler Capital